

In addition to my earlier comment, I wanted to point out that certain recent technological initiatives may not augur well for localism. I am speaking, specifically, of the mandated transition to digital TV, and the potential for a similar mandate in radio, now that a workable digital standard appears to exist in HD Radio. If, as I said in my original comment from earlier today, the cause of localism will best be served by letting anyone with the price of transmission equipment go on the air, then it's just as important for that price to be as low as possible. In radio, technological and manufacturing advances have enabled the development of remarkably inexpensive transmitters that emit high-quality analog signals at low-to-moderate power levels. In television, quality analog mini-transmitters aren't quite as affordable, but a dedicated hobbyist or small-business owner can still acquire them for a reasonable price. This is not true of transmission equipment for digital radio or TV, which is currently built for and marketed to commercial broadcasters and well-heeled non-commercial outlets. By requiring all TV broadcasters to make the transition to digital, the government guarantees that the "Mom-n-Pop" local TV stations that might otherwise spring up, due to price reductions on analog equipment in a competitive market, will instead be priced out of the business altogether. Once HD Radio or some other digital standard becomes established, a similar digital transition mandate in radio could ultimately lock out hundreds or thousands of truly local broadcasters who, currently, may easily afford the cost of going on the air with analog gear.

If digital transition mandates are unavoidable, one way to promote localism would be to trigger the universal digital transmission requirement on the affordability of transmission equipment. For example: Once a basket of key "digital transmission chain" items were widely available and cost, say, \$500 or less, then all officially-licensed broadcasters might be required to make the switch (or all transmission equipment might need to be able to broadcast in the digital mode, in order to receive FCC approval). Of course, this would be so much like simply letting normal marketplace forces determine the transition rate, that you might not want to mandate a transition date or trigger at all: by the time the price of digital transmission equipment drops far enough to trigger the kind of government mandate I describe here, every serious broadcaster would probably have or be in the process of getting appropriate new gear, anyway, just to maintain a competitive edge.